

TB-529-C

Eisenberg Gold & Agrawal, P.C.
William E. Craig, Esq.
1040 Kings Highway North #200
Cherry Hill, NJ 08034
(856) 330-6200
Attorney for: Truist Bank

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

IN RE:

HAYDEE VELAZQUEZ

} Case No. 23-17261 (JNP)

} CHAPTER 13

} Hearing Date:

} CERTIFICATION IN SUPPORT OF
} MOTION OF TRUIST BANK FOR RELIEF
} THE AUTOMATIC STAY

Latosha A. Moady certifies as follows:

1. I am employed by Truist Bank ("Truist") and am familiar with the facts of this case.
2. On October 12, 2022, the Debtor executed a Retail Installment Contract for the purchase of a **2019 Volkswagen Jetta** more particularly described in the following paragraph. The contract was assigned to Truist Bank and the Debtor became indebted to Truist in accordance with the terms of same. To secure payment of the contract, the Debtor(s) caused the title to the vehicle to be delivered to Truist Bank. As a result, Truist Bank is the holder of a first purchase money security interest encumbering the vehicle. True copies of the contract and title are annexed hereto as exhibits A and B.

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3. The following information sets forth the make, model and serial number of the vehicle, the original terms of the contract, the clean retail and trade-in values of the vehicle, and the current status of the Debtor's loan:

A. Make, model and serial number of motor vehicle:

2019 Volkswagen Jetta

Serial number: 3VWE57BU5KM089481

B. Original Contract terms:

(i) Total of payments: \$33,705.75

(ii) Term: 75 months

(iii) Monthly payment: \$449.41

(iv) First payment due: 11-11-2022

C. Clean retail value: \$16,850.00*

Clean trade-in value: \$12,950.00*

*Values derived from NADA Official Used Car Guide, January 2025 edition

D. Delinquency status: Account is past due from 7-11-24 to 1-11-25

Arrears: \$2,834.10

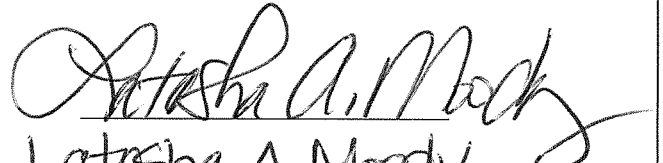
E. Statement of Balance Due:

Net loan balance: \$21,789.00

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4. Truist Bank requests relief from the automatic stay for the following reasons:
 - a. The Debtor is failing to make payments to Truist and is failing to provide Truist with adequate protection.

I CERTIFY THAT THE FOREGOING STATEMENTS MADE BY ME ARE TRUE. I AM AWARE THAT IF ANY OF THE FOREGOING STATEMENTS MADE BY ME ARE WILLFULLY FALSE, I AM SUBJECT TO PUNISHMENT.


Latosha A. Maady
Bankruptcy Analyst

UNITED STATES BANKRUPTCY COURT
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Caption in compliance with D.N.J. 9004-1(b)

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**CERTIFICATION OF CREDITOR
REGARDING POST PETITION PAYMENT HISTORY
(VEHICLE LOAN/LEASE)**

Latosha A. Moody, employed as Bankruptcy Analyst by
Truist Bank, hereby certifies the following:

Vehicle lender/lessor: Truist

Vehicle description: 2019 Volkswagen Jetta

POST-PETITION PAYMENTS RECEIVED (Petition filed on 8/22/2023)

Amount due	Date Payment due	Date payment received	Amount received	How payment applied (mo/yr)	Type of payment (See Legend below)
1. \$ 449.41	9/11/2023	8/31/2023	\$ 460.00	9/23	MP
2. \$ 449.41	10/11/2023	10/01/2023	\$ 449.41	10/23	MP
3. \$ 449.41	11/11/2023	11/01/2023	\$ 449.41	11/23	MP
4. \$ 449.41	12/11/2023	11/30/2023	\$ 449.41	12/23	MP
5. \$ 449.41	1/11/2024	1/1/2024	\$ 449.41	1/24	MP
6. \$ 449.41	2/11/2024	2/1/2024	\$ 449.41	2/24	MP

Amount due	Date Payment due	Date Payment received	Amount Received	How Payment applied (mo/yr)	Type of Payment (See Legend below)
7. \$ 449.41	3/11/2024	2/28/2024	\$ 450.00	3/2024	MP
8. \$ 449.41	4/11/2024	4/3/2024	\$ 449.41	4/2024	MP
9. \$ 449.41	5/11/2024	5/6/2024	\$ 450.00	5/2024	MP
10. \$ 449.41	6/11/2024	5/30/2024	\$ 449.41	6/2024	MP
11. \$ 449.41	7/11/2024	7/31/2024	\$ 300.00	7/2024	MP
12. \$ 449.41	8/11/2024				
TOTAL: \$ 5,392.92			\$ 4,805.87		

[Continue on attached sheets if necessary]

Monthly payments past due at \$ _____ per month from _____ to _____ : \$ _____

Plus miscellaneous amounts due:

Late Charges: \$ _____
 Repossession fees: \$ _____
 Extension fees: \$ _____
 Other: \$ _____

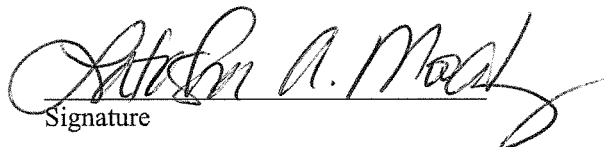
TOTAL POST-PETITION PAST DUE..... \$ _____ 0.00

Pre-petition arrears: _____ to _____
 (_____ months x \$ _____ per month = \$ 0.00)

Legend: MP = monthly payment; EXF = Extension fee; LC = Late Charge; O = Other *specify other payments received

I certify under penalty of perjury that the above is true.

Date: 1/14/25


 Signature

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in compliance with D.N.J. 9004-1(b)

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2. \$ 449.41	10/11/2024				
3. \$ 449.41	11/11/2024				
4. \$ 449.41	12/11/2024				
5. \$ 449.41	1/11/2025				
6.					

Amount due	Date Payment due	Date Payment received	Amount Received	How Payment applied (mo/yr)	Type of Payment (See Legend below)
7.					
8.					
9.					
10.					
11.					
12.					
TOTAL: \$ 2,247.05			\$ 0.00		

[Continue on attached sheets if necessary]

Monthly payments past due at \$ 449.41 per month from August 2024 to January 2025 : \$ 2,834.10

Plus miscellaneous amounts due:

Late Charges: \$ _____
 Repossession fees: \$ _____
 Extension fees: \$ _____
 Other: \$ _____

TOTAL POST-PETITION PAST DUE..... \$ 2,834.10

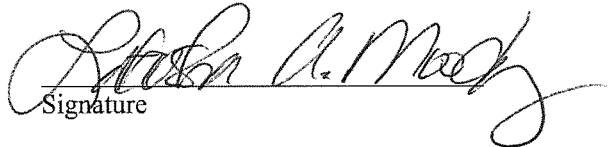
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Date: 1/14/25


Signature